

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
Caption in Compliance with D.N.J. LBR 9004-1(b)

**GREENBERG TRAURIG, LLP**

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*Co-counsel to the Ad Hoc Group*

In re:

WEWORK INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 23-19865 (JKS)

(Joint Administration Requested)

**APPLICATION FOR THE *PRO HAC VICE***  
**ADMISSION OF NATASHA TSIOURIS, ESQ.**

The Ad Hoc Group (as defined in the First Day Declaration) by and through its undersigned co-counsel, Greenberg Traurig, LLP, respectfully makes this application (the “**Application**”), for *pro hac vice* admission of Natasha Tsiouris, Esq., and represents as follows:

1. On November 6, 2023, the above-captioned debtors and debtors-in-possession (the “**Debtors**”), filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, as amended the (“**Chapter 11 Cases**”) in the United States Bankruptcy Court for the District of New Jersey.

2. Ms. Tsiouris is a partner of the firm of Davis Polk & Wardwell LLP, which maintains offices at, among other places, 450 Lexington Avenue, New York, NY 10017.

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases is attached hereto as Exhibit A-1, and may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/WeWork>. The location of Debtor WeWork Inc.’s principal place of business is 12 East 49th Street, 3rd Floor, New York, NY 10017, and the Debtors’ service address in these chapter 11 cases is WeWork Inc. c/o Epiq Corporate Restructuring, LLC 10300 SW Allen Blvd. Beaverton, OR 97005.

Because of her familiarity with the facts and circumstances relevant to the Debtors in the within matter, the Ad Hoc Group requests that Ms. Tsiouris be allowed to appear *pro hac vice* for the purposes of representing the Ad Hoc Group in connection with the Chapter 11 Cases.

3. As set forth in the accompanying Declaration of Natasha Tsiouris, Esq., Ms. Tsiouris is a member in good standing of the bar of the State of New York. Ms. Tsiouris is not under suspension or disbarment by any court.

4. If admitted *pro hac vice*, Ms. Tsiouris has represented that she will adhere to the disciplinary jurisdiction of this Court. Ms. Tsiouris also has represented that she will arrange with the New Jersey Lawyer's Fund for Client Protection for payment of the applicable annual fee under New Jersey Court Rule 1:28-2(a) and shall pay the fee required by L. Civ. R. 101.1(c)(3) for *pro hac vice* admission to this Court.

WHEREFORE, it is respectfully requested that the Court grant this Application, pursuant to D.N.J. LBR 9010-1 and L. Civ. R. 101.1(c), to admit Natasha Tsiouris, Esq. *pro hac vice* in the above-captioned matter.

*[Remainder of page intentionally left blank.]*

Dated: November 7, 2023

Respectfully submitted,

/s/ Alan J. Brody

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